



Laurel Highland Long Distance Company  
4156 Main Street  
PO Box 168  
Stahlstown, PA 15687  
724.593.2411  
724.593.2423  
FEB 26 2009  
Received & Inspected  
FCC Mail Room

February 23, 2009

Marlene H Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

**RE: EB-06-36  
CPNI Annual Certification**

Dear Ms. Dortch:

Enclosed please find our company's annual CPNI certification. Additionally, two courtesy copies have been sent to the Federal Communications Commission, Enforcement Bureau and one copy to Best Copy and Printing, Inc.

Please contact us at 724 593-2411 if you have any questions or require additional information.

Sincerely,

James J Kail  
President & CEO

CC Federal Communications Commission  
CC Best Copy & Printing, Inc

No. of Copies rec'd 0  
List ABCDE

Received & Inspected

FEB 26 2009

FCC Mail Room

**CPNI CERTIFICATION**  
[Section 64.2009(e) of FCC Rules]

**EB DOCKET NO. 06-36**

I certify that I am an Office of Laurel Highland Long Distance Company.

FCC For Filer ID:

I have personal knowledge that Laurel Highland Long Distance Company [and its affiliates] established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules and requirements in Subpart U of Part 64 of the Federal Communications Commission's Rules (47 C.F.R. &64.2001 through 64.2011). The attached Statement of CPNI Compliance explains how the Company's operating procedures ensure that it is in compliance with the foregoing FCC rules.

The Company \_\_\_ has X has not taken any actions (proceeding instituted or petitions filed by a company at either state commission, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexter are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. If applicable, a summary of actions taken will be attached to the certification.

The Company \_\_\_ has X has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information). If applicable, a summary of customer complaints will be attached to this certificate.

I am making this certification for the year 2008.

James J Kail  
Signature

James J Kail  
Printed Name

President & CEO  
Office Held

2/23/09  
Date

## CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

James J Kail signs this Certificate of Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulation (CFR) Title &4.2009, on behalf of Laurel Highland Long Distance Company. This Certificate of compliance addresses the requirement of FCC's (CFR) Title 47 &64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with FCC's (CFR) Title 47 &64.2001-.2011.

On behalf of the Company, I certify as follows:

1. I am the President & CEO of the Company. My business address is

4157 Main St, PO Box 168  
Stahlstown, PA 15687.

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Commission's (FCC) rules relating to customer proprietary network information (CPNI).
3. The Company has established a system by which the status of a customers' approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of the applicable law has occurred.
4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or Patricia A Yoders, The Company's Customer Service Manager. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.
6. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records for customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.

**CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER  
PROPRIETARY NETWORK INFORMATION RULES (Cont'd)**

7. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.
8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or Patricia A. Yoders regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either Patricia A. Yoders or I consult one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and if necessary, legal council. The Company's sale personnel must obtain supervisory approval from either Patricia A. Yoders or I regarding any proposed use of CPNI.
9. Further, both Patricia A. Yoders and I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.
10. Patricia A. Yoders and I also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.
11. Both Patricia A. Yoders and I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year. The form includes explanation of any action taken against data brokers, a summary of all customers' complaints, and an explanation of breaches.

Jane J. Paul  
(Signature)

Laurel Highland Long Distance  
Company

2/23/09  
Date

# CUSTOMER COMPLAINTS REGARDING CPNI

<u>Date</u>	<u>Description of Complaint</u>	<u>Action Taken</u>
	NIA X	NIA X

Jones Paul  
Signature

2/23/09  
Date

## ACTION(S) TAKEN AGAINST DATA BROKERS

<u>Filing Date</u>	<u>Filed With</u> (State Commission, FCC, Courts)	<u>Explanation</u>
	NIA X	NIA X

Jane Paul

Signature

2/23/09

Date